

From: Kelly Wright [kwright@sbtribes.com]
Sent: Monday, December 02, 2013 11:32 AM
To: Rochlin, Kevin
Cc: susanh@ida.net; Virginia Monsisco
Subject: Tribes comments

Categories: 11-19 to 1-10 2014

Kevin as promised, here are our comments:

- **Response 2:** The Tribes request an expanded Field analyses to include all COC rather than indicator constituents on a specified number of samples.
- **Response 8:** Why is FMC resisting to using a roto-sonic drilling method? FMC calls out Air rotary casing hammer or percussion drilling methods why does EPA want one over the other?
- **Response 12:** Tribes do not agree with waste determination based on process knowledge. Sampling and analyses should be followed and include all chemicals of concern as well as radiological parameters. Specific details should be provided on how and where water will be used on site prior to any discharges.

Shoshone- Bannock Tribes specific comments/ responses:

The Tribes maintain their position on General Comment. We reserve the right to re-evaluate the groundwater model report and assumptions derived from that report including parameters selected for flow and contaminant transport models, assess reasonableness of predicted parameters, and gain better understanding of sorption coefficients, dispersivity and porosity.

The Tribes maintain production wells, irrigation wells and other wells within a defined radius should be monitored during step draw down testing.

Second bullet section 2.1.4. Tribes maintain this statement should be added. The statement is accurate.

The Tribes maintain their request on sampling prior to any water being discharged on Tribal lands or State lands. The Tribes do not agree with FMC response that aluminum, antimony, beryllium, cadmium, copper, lead, molybdenum, mercury, silver, thallium, zinc, organic compounds, and radionuclides are not FMC related contaminants. The Tribes believe these are FMC related contaminants as shown historically in the sampling efforts

Thanks for providing us an opportunity to provide our comments.

Kelly C. Wright